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DOCKET CONTROL

October 8, 2007

Arizona Corporation Commission

DOCKETED

OCT 09 2007

HAND DELIVERED

Arizona Corporation Commission

Docket Control

1200 West Washington

Phoenix, Arizona 85007

DOCKETED BY

**Re: Docket Nos. W04137A-05-0286 and SW-04136A-05-0287,
Decision No. 68243**

Dear Docket Control:

This letter is being submitted to support the request made by Santa Rosa Water Company ("SRWC") for a six-month extension to submit the developer's initial Certificate of Assured Water Supply ("CAWS") in the Certificate of Convenience & Necessity ("CC&N") extension area, granted to SRWC in Decision No. 68243.

We represent the developer, TOUSA Homes, Inc. ("TOUSA"). TOUSA submitted an application for a CAWS to the Arizona Department of Water Resources ("ADWR") on July 18, 2007 for Red River-Province Phase I ("Province"). Province is within the CC&N extension area. As of this date, the well that will serve the development has been permitted and drilled and ADWR has approved the initial notice of intent for SRWC to establish a new service area. These steps were necessary in order for ADWR to process TOUSA's CAWS application.

Only a handful of additional events need to occur before ADWR can issue the CAWS. The Central Arizona Groundwater Replenishment District ("CAGRD") will confirm that TOUSA owns the property and send that confirmation to ADWR. We expect the CAGRD send the ownership confirmation to ADWR within the next two weeks. Once this occurs, ADWR will initiate the public notice process for Province, which consists of a notice published twice in the local newspaper, one week apart, followed by a 14-day public comment period. If the CAGRD confirms ownership by October 19, 2007, ADWR can publish the first notice on approximately October 23, 2007, which will place the end of the public comment period on approximately November 13, 2007. Assuming there are no objections to the CAWS application, the CAWS application enters ADWR's substantive review process, which includes a final review of the application. At the same time, the CAGRD will complete its enrollment of Province as a member land. The substantive review and final enrollment process will take approximately another three to four weeks. Once the CAGRD records the enrollment documents with the



county recorder, ADWR can issue the CAWS for Province. As a result, the CAWS will more than likely be issued by December 11, 2007, but it will not be issued before the October 25, 2007 deadline set by the Commission's May 11, 2006 procedural order.

Therefore, we support SRWC's request for a six-month extension of time, until April 25, 2008, to submit the developer's initial CAWS in the CC&N extension area and urge the Commission to grant the extension. This six month extension will give ADWR sufficient time to finish processing TOUSA's CAWS application and issue the CAWS for Province.

An original and 15 copies are submitted.

Very truly yours,

A handwritten signature in cursive script that reads 'Sheryl A. Sweeney'.

Sheryl A. Sweeney

c: Mr. Glen Tulk, TOUSA Homes, Inc.
Ms. Jennifer Lee, TOUSA Homes, Inc.
Mr. Bill Cordes, TOUSA Homes, Inc.
Mr. Jim Poulos, Santa Rosa Water Company
Ms. Amy R. Fish, Ryley Carlock & Applewhite